

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DENNIS GROMOV, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

BELKIN INTERNATIONAL, INC.,

Defendant.

Case No. 1:22-cv-6918

Judge Valderrama

Magistrate Judge Fuentes

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

LENORE MILEY, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

BELKIN INTERNATIONAL, INC.,

Defendant.

Case No. 20STCV00033

Assigned for All Purposes to:
the Honorable Carolyn B. Kuhl

STIPULATION BETWEEN THE PARTIES

This is a stipulation between the parties in both cases, regarding the use of discovery responses and depositions.

1. The parties stipulate that on a going forward basis the depositions of non-expert witnesses in either case (the "Depositions") may be used by any party in accordance with the provisions of this Stipulation subject to appropriate objections and the rules of evidence applicable in the particular proceeding.

2. The parties also stipulate that:
 - a. The Depositions, to be captioned in both *Gromov* and *Miley* (unless a Court orders otherwise), are as follows:
 - Rule 30(b)(6)/PMK deposition of Belkin (designee will be Melody Tecson)
 - Individual deposition of Melody Tecson
 - Individual deposition of Norbert Von Boode
 - b. The scope of the Rule 30(b)(6)/PMK deposition will be governed by the topics in Plaintiffs' deposition notice subject to the objections made to that notice. It will not be a basis for an instruction not to answer any question on the grounds that such questions were previously asked in another deposition.
 - c. Any questions asked, objections made, and answers given are considered to be made in both cases.
 - d. To the extent the witness has personal knowledge of the documents presented, Belkin will not object to the use of any document, discovery response, or transcript with any witness.
 - e. The procedure for the Depositions will be governed by the Federal Rules.
 - f. The parties will meet and confer in good faith to the extent more than seven (7) hours is reasonably required to complete one of the Depositions.
 - g. Each party will have only one lawyer making the objections and examining the witnesses. However, attorneys from both cases are free to attend the depositions.
3. Plaintiffs each agree that, if the above stipulations are observed, they will not call the witnesses subject to this stipulation again in either case—with two exceptions. One: if either Court orders that further depositions of a witness subject to this stipulation may be taken. Two: if Belkin produces further written material, then a second deposition may be taken, limited to the matter discussed in that further written material.
4. Ms. Tecson's individual deposition shall be taken at the same time as the Rule 30(b)(6)/PMK deposition.
5. Nothing in this stipulation is intended to affect or modify any order of either Court, or the otherwise applicable rules. By way of example:
 - a. The relevant confidentiality order entered in a case where discovery is produced continues to apply.
 - b. Nothing in this stipulation affects existing limits on the number of discovery requests in either case, or affects the scope of discovery in either case.

- c. Nothing in this stipulation affects a party's right to argue for the exclusion of evidence on grounds that it is irrelevant, lacks admissibility under *Daubert/Sargon*, or for some other evidentiary reason.

Agreed to by:

_____	Dated: _____
Counsel for Dennis Gromov	
_____	Dated: _____
Counsel for Lenore Miley	
_____	Dated: _____
Counsel for Belkin in <i>Gromov</i>	
_____	Dated: _____
Counsel for Belkin in <i>Miley</i>	